

DOE/RFFO COMMENTS ON "PROGRAMMATIC PRELIMINARY REMEDIATION GOALS" dated June, 1994

GENERAL COMMENTS

- (1) Change the title of this document to Programmatic Risk Based Preliminary Remediation Goals since this is what the document truly is. Once site wide chemical specific (or concentration based) ARARs have been finalized they may be combined with the programmatic risk based preliminary remediation goals to formulate RFS programmatic preliminary remediation goals. The text should be modified where appropriate to account for the difference between PPRGs and programmatic risk based PRGs.
- (2) Text should be added regarding the calculation of PRGs for the various dermal contact exposure routes for soil, sediments and water. This was discussed at our May 24 1993 meeting with EPA and CDH on programmatic PRGs. Dermal exposure PRGs will not be included with the programmatic PRGs but will be evaluated on an OU specific basis based on the results of the baseline risk assessment. At this meeting staff level agreement was reached for the following process:
 - (a) calculate OU specific PRGs for dermal contact exposure pathways as part of each COC technical memorandum
 - (b) evaluate dermal contact per EPA thresholds [Chapter 9 of Dermal Exposure Assessment: Principles and Applications (EPA/600/8-91/011B) dated January 1992] on a chemical specific basis where the excess cancer risk is less than $1E-6$ (to determine if the dermal exposure pathway makes any difference at the source or OU)
 - (c) Calculate dermal contact PRGs if the excess cancer risk is less than $1E-6$
 - (d) use the PRG as the RBC in the COC flowchart and conservative screen in the baseline risk assessment
 - (e) use for OU specific PRGs in the FS/CMS

SPECIFIC COMMENTS

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| page 1 par 1 line 6 | Insert Colorado Hazardous Waste Act (CHWA) after RCRA |
| | Replace remediation with hazardous substance response |
| page 3 last 2 lines | Replace during the Detailed Analysis of Alternatives with as early as possible during the Development and Screening of Alternatives or Detailed Analysis of Alternatives |
| page 4 par 1 line 5 | Replace PPRG with programmatic risk based PRG |

page 4 par 2 line 6	Replace PPRG with programmatic risk base PRG
page 4 par 3	State that programmatic risk based PRGs assuming (1) 1E-4 risk and (2) a reasonable land use will be used to screen for potential early actions
page 6 bullets	<p>If appropriate add the following to bullets</p> <p>Human Health Evaluation Manual Supplemental Guidance Standard Default Exposure Factors (USEPA 1991b)</p> <p>This is OSWER Directive 9285 6 03 dated March 25 1991</p> <p>Also if appropriate include in Section 7 0 References and in the Tables</p>
page 6 par 2 line 8	For radionuclides should it be 1 cancer death per 1 000 000? If so modify text as necessary We need to differentiate between radionuclides and chemicals where appropriate
page 7 Sec 4 1 line 2	Delete future since it is not appropriate in this context
Sec 4 1 and 4 2	Add Sand and Gravel Mining Scenario Include appropriate media/pathways
page 30 Sec 6 0 pars 1 and 2	Replace PPRG with programmatic risk based PRG
page 30 Sec 6 0 par 2 line 4	Insert ecological effects after worker safety
page 30 Sec 6 0 par 2 2nd last line	Replace during the Detailed Analysis of Alternatives with as soon as possible during the Development and Screening of Alternatives or Detailed Analysis of Alternatives